

Lake

Carriers' Association



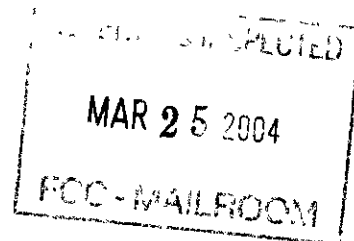
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JAMES H. I. WEAKLEY
PRESIDENT

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February 25, 2004



Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S W
TW-325
Washington, DC 20554

Re: COMMENTS ON MARITEL, INC. PROPOSAL FOR SHARED USE OF MARITIME VHF CHANNELS 87B AND 88B FOR AUTOMATIC IDENTIFICATION SYSTEMS

DA 04-378

RM 10321 **10821**

Dear Sir or Madam:

Lake Carriers' Association represents 15 U.S.-flag Great Lakes fleets, which have a combined total of 57 vessels with a per-trip carrying capacity of more than 1.7 million tons. Major cargos include iron ore for the steel industry, coal for power generation, and limestone for the construction industry. LCA's members have the capacity to haul more than 115 million tons of dry- and liquid-bulk cargo on an annual basis.

We are writing to express our serious concerns with the referenced proposal. If this proposal is accepted, Maritel, Inc. would have a monopoly over public access to AIS information outside a Vessel Traffic System (VTS). For example, the Area Maritime Security Plan for a major Great Lakes port proposes to use AIS as a means of communicating security information to inbound and outbound vessels. It is unclear if Maritel, Inc. would allow this use of AIS. Under the proposal, they are under no obligation to allow this use of AIS. In the event Maritel, Inc. did agree, there would likely be a fee, which to us is unacceptable given that carriage of AIS is required by the Federal government and in cited instance, is being used to facilitate compliance with the Maritime Transportation Security Act of 2002.

Our members will be expending considerable funds to meet the requirement to have AIS equipment on their vessels. In the best interests of safe and secure waterborne commerce, access to the AIS frequencies should be readily available and free of charge.

Sincerely,

James H. I. Weakley
President

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